

Child Care Assistance Program Provider Memo

Date: April 17, 2020

To: Child care providers registered with the Child Care Assistance Program

From: Department of Human Services, Child Care Assistance Program Staff

RE: Child Care Assistance Program (CCAP) Information for Child Care Providers Related to COVID-19, Part II (Updates on Absent Days and Closed Providers)

Per [Executive Order 20-12](#) the Child Care Assistance Program (CCAP) temporarily modified some policies to support families and providers in response to COVID-19.

For more information and links to the executive orders, visit the department's [COVID-19 webpage](#).

This memo provides information for child care providers about temporary policy modifications and gives reminders about standard policies. It supplements and clarifies information provided in a memo titled [Child Care Assistance Program \(CCAP\) Information for Child Care Providers Related to COVID-19](#).

These policies:

- Allow payments to closed providers for up to one month, beginning as early as March 13, 2020 and ending no later than June 30, 2020
- Allow for absent day exemptions from March 13, 2020 through June 30, 2020, at child care providers that remain open
- Allow providers that are closed or paid absent days to receive payments for children on child care assistance even if they choose not to charge private-pay families
- Explain that temporary policies for absent day exemptions for open providers and policies for providers that close cannot be used at the same time
- Extend redetermination dates three months for cases with due dates between March 27, 2020, and June 30, 2020
- Extend registration renewal dates three months for providers with due dates between March 20, 2020 and June 30, 2020.

1. Continue to pay closed providers when the family does not need child care assistance to pay for care with an alternative provider

What is standard policy?

Usually, the Child Care Assistance Program does not pay providers when they are closed or when care is unavailable, unless the day meets payment criteria for a holiday. If a child changes providers, child care assistance pays the original provider during a 15-day notice period, unless the provider waives the notice or care is unavailable. The Child Care Assistance Program cannot start paying the new provider until the 15-days is done or care with the original provider is unavailable, whichever happens first.

Usually, the Child Care Assistance Program cannot pay two providers for the same period of time, and providers cannot charge families on child care assistance more than the private, full-paying client rate for like services.

How has the state updated or clarified temporary changes that allow payments to closed providers?

The department issued a [memo](#) that stated, beginning March 20, 2020, if a provider closes due to COVID-19 *and the child does not need care with another provider*, the Child Care Assistance Program can continue to pay the provider for up to one month based on the child's scheduled and authorized hours of care at the time of the provider's closure.

The Commissioner of Human Services approved updated policy waivers specifying:

- A provider may receive child care assistance payments for the time they are closed, even if they have chosen not to charge private pay-families during that time
- A provider may now bill and be paid for closed days:
 - Beginning the date the provider closed or *March 13, 2020*, whichever is later; and
 - Ending the earliest of:
 - One month from the date the provider closed; or
 - The date before the child starts care with a new provider; or
 - June 30, 2020.

NOTE: If the provider's closure is not consecutive, a month is defined as 30 days, allowing for dates when a provider re-opens. This applies only to providers who close, re-open, and then close again (see last example below).

For example:

- A provider closes **March 13, 2020**. If a child does not need care with a new provider, the Child Care Assistance Program could pay the closed provider for care authorized through **April 13, 2020**.
- A provider closes **March 13, 2020**. A child starts care with new provider on **March 23, 2020**, so the Child Care Assistance Program could pay the closed provider for care authorized through **March 22, 2020**.
- A provider closes **June 5, 2020**. If a child does not need care with a new provider, the Child Care Assistance Program could pay the closed provider for care authorized through **June 30, 2020**.
- A provider closes **March 13, 2020**, reopens from **April 6, 2020** to **April 12, 2020**, and then closes again from **April 13, 2020** to **April 30, 2020**. If a child does not need care with a new provider, the Child Care Assistance Program could pay the provider for a total of one month (30 days). The program could pay

the provider for care authorized from March 13, 2020 to April 5, 2020 (24 closed days), April 6, 2020 to April 12, 2020 (as open days), and April 13, 2020 to April 18, 2020 (six closed days).

NOTE: The Commissioner of Human Services approved another new policy waiver potentially allowing payment to two providers, if a child's usual provider closes due to COVID-19. The Child Care Assistance Program needs federal approval to allow this, so until then, standard policies prohibiting payment to two providers for the same period of time still apply.

What do I need to do to keep getting paid by the Child Care Assistance Program if I close?

- Contact each county or tribe where you are registered to inform the agency of the closure.
- Bill each child's scheduled and authorized hours prior to the closure.
- Enter a note in the Billing Form's Comment section regarding the closure on each bill submitted.
- Indicate a "C" for each day closed when submitting paper bills. *NOTE:* If you are a provider who bills electronically via MEC² PRO, you are unable to enter a "C" and only able to include a note in the Billing Form's Comment section regarding the closure.

This policy applies to all provider types, including legal nonlicensed child care providers.

A parent may contact their county or tribe to report a change in care needs.

Do NOT bill for more than one month after you close or after June 30, 2020, whichever happens first. If you bill past when payment is allowed, you may be charged with an overpayment.

2. Absent day exemptions

The department previously issued guidance expanding the use of absent day exemptions for providers that remain open between March 20, 2020 and June 30, 2020. The Commissioner of Human Services approved updated policy waivers specifying:

- A provider may receive child care assistance payments for absent days, even if they have chosen not to charge private pay-families during that time.
- The new timeframe for absent day exemptions for COVID-19 is *March 13, 2020* to June 30, 2020.

If you previously requested absent day exemptions for children between March 20, 2020 and June 30, 2020, there is no need to update your request to the Child Care Assistance Program agency (county or tribe) unless children stopped attending your program prior to March 20, 2020. If a child stopped attending prior to March 20, 2020, the family or you can contact the program worker to request that the start date of the exemption be changed to March 13, 2020.

3. Which temporary policy do I qualify for – absent day exemptions or payments to closed providers?

The Child Care Assistance Program has two temporary billing policies to help providers affected by COVID-19. You may only qualify for one of these temporary changes a time.

Temporary changes to absent day policies

This temporary policy allows more flexibility in absent day policies.

- It only applies if your program is open and care is available. You must keep attendance records for all children who attend and bill those children as present.
- Absent day exemptions under the temporary policy can begin no sooner than March 13, 2020 and last through June 30, 2020.

Temporary changes allowing payments for closed providers

This temporary policy allows payments for providers that are closed.

- It only applies if your program is closed for all children.
- If you are open to care for any children (including if you are only open to care for children of emergency personnel), children not in attendance must have an absent day exemption in order for you to be paid more than 25 absent days (or 10 consecutive).
- If your program closes due to COVID-19 and the child does not need care with another provider, the Child Care Assistance Program can pay your program for up to one month (or 30 days, allowing for open days, if closure is not consecutive) beginning the date you close (starting as early as March 13, 2020 and ending no later than June 30, 2020).

Other information

- Children must be authorized to receive payment. Standard authorizations policies apply.
- You must report to Child Care Assistance Program agencies (counties or tribes) if your program closes. Families or providers request absent day exemptions from Child Care Assistance Program agencies. *Do not contact Department of Human Services child care assistance staff.*
- Any information you provide to the department or a local agency may be shared with the Office of the Inspector General, which has enforcement authority regarding licensing and expenditure of public funds for the Child Care Assistance Program. If you do not provide accurate information, you are subject to laws that impact your ability to hold a license and to receive public funds.

For more information, see a memo titled [Child Care Assistance Program \(CCAP\) Information for Child Care Providers Related to COVID-19](#).

4. What if a family has a redetermination due?

What is current policy?

All families must complete a redetermination form and provide required verifications no more frequently than every 12 months. Sometimes redetermination due dates are pushed out longer than 12 months.

Providers with active service authorizations for a child receive a notice when their family's redetermination is due.

What temporary policy changes are allowed for COVID-19?

It is becoming more difficult for families to obtain verifications. Therefore, redetermination due dates will be pushed out three months for some cases with due dates between March 27, 2020 and June 30, 2020.

What does this mean for providers?

You may still receive a notice that a family's redetermination is due. The due date will be pushed out three months if the family does not submit a complete redetermination. Service authorizations will remain in effect during the additional three months if the family remains eligible. You may receive another notice later with the new redetermination due date. If the family no longer remains eligible, you will receive a service authorization ending notice.

For families who submit complete redeterminations, the redetermination will be processed. You will be notified if the family's eligibility and authorizations continue, change or end.

5. Provider renewals

The department previously told providers that provider renewals due between March 20, 2020, and June 17, 2020, may have their renewal due dates pushed out three months. The department is extending that timeframe to include providers with renewals due between March 20, 2020, and June 30, 2020.

6. How standard policies apply during this time

How do authorization and payments policies apply to school age children?

Child Care Assistance Program guidance for school age children during this time is below.

- If a child needs additional hours of care, authorization and payment can increase if the child is eligible for additional hours of care.
- If a child is not attending care during this time, authorization and payment should stay the same as what is typically needed while school is in session.
- A provider is not eligible for additional payment for "school release day" payment during this time if the parent is not intending to have children attend additional days.

Examples:

- A child typically attends care two hours a day after school and eight hours a day on school-release days. The child needs and is eligible for additional hours of care. The child has begun attending care with the provider for full-days. Payment should be made for additional hours.
- A child typically attends care two hours a day after school and eight hours a day on school-release days. The child stopped attending care due to COVID-19 concerns and has requested an absent day exemption. The provider is requesting full-day payments due to the child not being in school. Payment should continue to be made for two hours a day based on what is typically needed while school is in session. The provider is not eligible for full-day payments.

What happens if a family is unable to pay their copay?

Families with an income decrease should contact their Child Care Assistance Program worker to determine whether their copay can be reduced.

The family and provider have options if the family is not able to pay their copay during this time.

- You can waive the copay, give the family a discount on the copay, or set up a payment plan for the copay. The provider's child care assistance payment will not increase to cover the copay unless the family's copay decreases due to decreased income.
- You can continue charging the family for the copay. The family is responsible for paying the copay for the time period when child care assistance is authorized and paid.
 - The family could choose to keep Service Authorizations open.
 - The family could request to end Service Authorizations. Care and child care assistance payments would end with a 15-day notice.

7. Who do I contact with questions?

General questions

Visit the State of Minnesota's website with COVID-19 child care information for families and providers:
<https://mn.gov/childcare/>.

Child Care Assistance Program questions

Contact your local Child Care Assistance Program agency (county, tribe or other agency that administers the program) with any questions. Local agencies must handle all specific case and payment actions, such as extending absent days or payments during closures.

For general policy questions, contact the Minnesota Department of Human Services' Child Care Assistance Provider Line at 651-431-4848, or by email at DHS.CCAP@state.mn.us.

Licensing questions

Call the Child Care Provider Hotline: 1-888-234-1268

- Option 1: Child Care Centers and Certified Child Care Providers
- Option 2: Family Child Care Providers